

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JEFFREY ALONZO SIMMS,

Plaintiff,

V.

C.A. No. 04-1205-SLR  
JURY TRIAL OF 12

DEMANDED

HARRY M. FREEDMAN, M.D.,

DONNA BURNS, DR., and

MAJOR R. L. HUGHES,

Defendants.

**NOTICE OF SERVICE**

I, DIANE M. ANDREWS, ESQUIRE, hereby certify that DEFENDANT, HARRY M. FREEDMAN, M.D.'s, RESPONSE TO PLAINTIFF'S MOTION (filed 8/4/06) was served via e-filing to the following individual(s):

Jeffrey Alonzo Simms  
SBI #198625  
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ELZUFON, AUSTIN, REARDON,  
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/S/Jeffrey M. Austin

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(302) 428-3181  
Attorney for Defendant,  
Harry M. Freedman, M.D.

Dated: August 15, 2006

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JEFFREY ALONZO SIMMS,

Plaintiff,

v.

HARRY M. FREEDMAN, M.D.,  
DONNA BURNS, DR., and  
MAJOR R. L. HUGHES,

Defendants.

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C.A. No. 04-1205-SLR

TRIAL BY JURY OF  
TWELVE DEMANDED

**DEFENDANT HARRY M. FREEDMAN, M.D.'S  
RESPONSE TO PLAINTIFF'S PETITION**

COMES NOW, defendant Harry M. Freedman, M.D. (hereinafter referred to as "Dr. Freedman"), by and through undersigned counsel, hereby responds to plaintiff's Petition docketed on August 4, 2006, and states as follows:

1. This Motion is unintelligible. Accordingly, Dr. Freedman is unable to file a response thereto.

ELZUFON AUSTIN REARDON  
TARLOV & MONDELL, P.A.

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DATE: August 15, 2006